

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 04-10192-NG
	)	
CARLOS RUBEN RIVERA,	)	
	)	
Defendant.	)	

**GOVERNMENT'S MOTION TO DECREASE OFFENSE LEVEL BY ONE  
ADDITIONAL LEVEL FOR ACCEPTANCE OF RESPONSIBILITY**

The United States, by and through its attorneys, Michael J. Sullivan, United States Attorney for the District of Massachusetts, and Antoinette E.M. Leoney, Assistant U.S. Attorney, hereby moves, pursuant to U.S.S.G. §3E1.1(b) (effective April 30, 2003) and to the extent prescribed by U.S.S.G. §1B1.11, for an additional one level decrease in Defendant Carlos Ruben Rivera's offense level for acceptance of responsibility. The defendant is scheduled to be sentenced on September 8, 2005.

As grounds therefore, the government states that the defendant has assisted authorities in the investigation and prosecution of his own misconduct by timely notifying authorities of his intention to enter a guilty plea, thereby permitting the government to avoid preparing for trial and permitting the government and the court to allocate their resources efficiently.

WHEREFORE, the government respectfully requests that the Court impose an additional one level decrease in Defendant

Carlos Ruben Rivera's offense level for acceptance of responsibility.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

/s/ Antoinette E.M. Leoney  
ANTOINETTE E.M. LEONEY  
Assistant U.S. Attorney  
(617) 748-3100

Date: September 9, 2005

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by court electronic filing:

Timothy Watkins, Esq.  
Federal Defenders Office  
408 Atlantic Avenue, 3<sup>rd</sup> Floor  
Boston, MA 02210

This 9<sup>th</sup> day of September, 2005.

/s/Antoinette E.M. Leoney  
ANTOINETTE E.M. LEONEY